NORLITE CORPORATION

628 SO. SARATOGA STREET
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July 17, 2012

Mr. William J. Clarke
Regional Permit Administrator
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014 RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866 RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedance Report
Kiln 1: 06/27/12- 07/17/12
Kiln 2: 06/27/12- 07/17/12

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 06/27/12 thru 07/17/12. The attached document explains each of the "malfunctions" for Kiln One and Two.

The results of the investigation concluded a majority of the exceedances were a result of the 1 second time delay cutoff limit of -0.00 inches of water column associated with the negative backend chamber pressure. The majority of the cutoffs had causes associated with high LGF Line Pressure. High LGF Line Pressure made fuel flow control difficult which resulted in fuel flow surges which caused pressure pulses in the kiln system. The pressure pulses thus affected the Rear Chamber system and caused a cutoff to occur. Norlite and its consultant will continue to evaluate each cutoff in order to reduce the overall number of cutoffs.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tvanvranken@norlitecorp.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager
Attachments

ecc: Don Spencer, NYDEC – R4 w/attachments
James Lansing, NYSDEC – CO w/attachments
Joe Hadersbeck, NYSDEC – R4w/attachments

DCL: 2410

NORLITE CORPORATION
MACT EXCEEDANCE REPORT - KILN 1
06/27/12 - 07/17/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
6/30/2012	15:06:23	6/30/2012	15:14:33	0:08:10	102	Malfunction	The End of the Burn Tank Was Reached Which Caused the LGF Pump to Surge Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Switched Tanks
7/2/2012	11:36:31	7/2/2012	11:45:23	0:08:52	103	Malfunction	The LGF Pump Started to Surge and then Stop Which Caused a LGF Fuel Surge Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Restarted LGF Pump
7/3/2012	4:08:59	7/3/2012	4:09:49	0:00:50	104	Malfunction	The LGF Pump Started to Surge and then Stop Which Caused a LGF Fuel Surge Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Restarted LGF Pump
7/10/2012	14:55:03	7/10/2012	14:55:29	0:00:26	105	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused A Fuel Flow Surge Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow and Adjusted LGF Line Pressure

NORLITE CORPORATION
MACT EXCEEDNACE REPORT - KILN 2
06/27/12 - 07/17/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
6/29/2012	1:36:23	6/29/2012	1:36:57	0:00:34	281	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused A Fuel Flow Surge Which Caused A Pressure Pulse In the Kiln Which Affected the Rear Chamber System/ No Visible Emission	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
6/29/2012	14:51:21	6/29/2012	14:52:34	0:01:13	282	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused A Fuel Flow Surge Which Caused A Pressure Pulse In the Kiln Which Affected the Rear Chamber System/ No Visible Emission	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
7/3/2012	9:36:36	7/3/2012	9:40:09	0:03:33	283	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure. The High Pressure Caused a Partial Blockage of the Ball Valve to Occur Which Inconsistent Fuel Flow Which Caused A Pressure Pulse In the Kiln Which Affected the Rear Chamber System/ No Visible Emission	Back Chamber Pressure, 1 Second Delay	Opl	Cleared Ball Valve and Adjusted LGF Line Pressure
7/3/2012	10:30:10	7/3/2012	10:31:32	0:01:22	284	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure. The High Pressure Caused a Partial Blockage of the Ball Valve to Occur Which Inconsistent Fuel Flow Which Caused A Pressure Pulse In the Kiln Which Affected the Rear Chamber System/ No Visible Emission	Back Chamber Pressure, 1 Second Delay	Opl	Cleared Ball Valve and Adjusted LGF Line Pressure
7/6/2012	11:54:23	7/6/2012	11:55:45	0:01:22	285	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure. The High Pressure Caused a Partial Blockage of the Ball Valve to Occur Which Caused A Fuel Flow Surge Which Caused A Pressure Pulse In the Kiln Which Affected the Rear Chamber System/ No Visible Emission	Back Chamber Pressure, 1 Second Delay	Opl	Cleared Ball Valve and Adjusted LGF Line Pressure
7/6/2012	11:57:46	7/6/2012	11:58:15	0:00:29	286	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure. The High Pressure Caused a Partial Blockage of the Ball Valve to Occur Which Caused A Fuel Flow Surge Which Caused A Pressure Pulse In the Kiln Which Affected the Rear Chamber System/ No Visible Emission	Back Chamber Pressure, 1 Second Delay	Opl	Cleared Ball Valve and Adjusted LGF Line Pressure
7/6/2012	12:10:33	7/6/2012	12:10:59	0:00:26	287	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure. The High Pressure Caused a Partial Blockage of the Ball Valve to Occur Which Caused A Fuel Flow Surge Which Caused A Pressure Pulse In the Kiln Which Affected the Rear Chamber System/ No Visible Emission	Back Chamber Pressure, 1 Second Delay	Opl	Cleared Ball Valve and Adjusted LGF Line Pressure

7/6/2012	17:13:10	7/6/2012	17:13:35	0:00:25	288	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure. The High Pressure Caused a Partial Blockage of the Ball Valve to Occur Which Caused A Fuel Flow Surge Which Caused A Pressure Pulse In the Kiln Which Affected the Rear Chamber System/ No Visible Emission	Back Chamber Pressure, 1 Second Delay	Opl	Cleared Ball Valve and Adjusted LGF Line Pressure
7/7/2012	23:09:14	7/7/2012	23:09:39	0:00:25	289	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure. The High Pressure Made Flow Control Difficult Which Lead to Inconsistent Fuel Flow Which Caused A Fuel Flow Surge to Occur Which Caused A Pressure Pulse In the Kiln Which Affected the Rear Chamber System/ No Visible Emission	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
7/8/2012	1:28:21	7/8/2012	1:28:46	0:00:25	290	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure. The High Pressure Made Flow Control Difficult Which Lead to Inconsistent Fuel Flow Which Caused A Fuel Flow Surge to Occur Which Caused A Pressure Pulse In the Kiln Which Affected the Rear Chamber System/ No Visible Emission	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
7/8/2012	1:28:53	7/8/2012	1:29:14	0:00:21	291	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure. The High Pressure Made Flow Control Difficult Which Lead to Inconsistent Fuel Flow Which Caused A Fuel Flow Surge to Occur Which Caused A Pressure Pulse In the Kiln Which Affected the Rear Chamber System/ No Visible Emission	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
7/8/2012	13:59:46	7/8/2012	14:00:16	0:00:30	292	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure. The High Pressure Made Flow Control Difficult Which Lead to Inconsistent Fuel Flow Which Caused A Fuel Flow Surge to Occur Which Caused A Pressure Pulse In the Kiln Which Affected the Rear Chamber System/ No Visible Emission	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
7/8/2012	14:14:02	7/8/2012	14:15:09	0:01:07	293	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure. The High Pressure Made Flow Control Difficult Which Lead to Inconsistent Fuel Flow Which Caused A Fuel Flow Surge to Occur Which Caused A Pressure Pulse In the Kiln Which Affected the Rear Chamber System/ No Visible Emission	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
7/11/2012	21:00:55	7/11/2012	21:14:54	0:13:59	294	Malfunction	The End of the Burn Tank Was Reached Which Caused the LGF Pump to Surge Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Switched Tanks

7/12/2012	20:25:25	7/12/2012	20:26:04	0:00:39	295	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure. The High Pressure Made Flow Control Difficult Which Lead to Inconsistent Fuel Flow Which Caused A Fuel Flow Surge to Occur Which Caused A Pressure Pulse In the Kiln Which Affected the Rear Chamber System/ No Visible Emission	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
7/13/2012	4:53:43	7/13/2012	4:54:11	0:00:28	296	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure. The High Pressure Made Flow Control Difficult Which Lead to Inconsistent Fuel Flow Which Caused A Fuel Flow Surge to Occur Which Caused A Pressure Pulse In the Kiln Which Affected the Rear Chamber System/ No Visible Emission	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow